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District of Nevada  
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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TIMOTHY CASEY,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00546-JAD-GWF

**JOINT STIPULATION FOR EXTENSION OF  
TIME AND [PROPOSED ORDER]**

**(FOURTH REQUEST)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from December 11, 2018 to **December 12, 2018**. This is Defendant's fourth request for extension. Good cause exists to grant Defendant's request for extension. Due to scheduling conflicts for agency and U.S. Attorney review, Counsel has a Ninth Circuit brief due this week. In addition, Counsel has a Ninth Circuit oral argument next week, which requires significant preparation and moot courts. Counsel also had a migraine yesterday and was out of the office on sick leave. Good cause also exists as Counsel had an emergency matter arise in one of her other cases that she must immediately respond to on the date of the current filing deadline. As such, Counsel needs additional time to adequately review the transcript

1 and properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in  
2 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
3 Court's Scheduling Order shall be modified accordingly.  
4

5  
6 Respectfully submitted,

7 Dated: December 11, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on December 11, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

10  
11 Dated: December 11, 2018

DAYLE ELIESON  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

14  
15 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

18 **ORDER**

19 APPROVED AND SO ORDERED:  
20

21  
22 DATED: 12/12/2018

George Foley Jr.  
HON. GEORGE FOLEY, JR  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I, TINA L. NAICKER, certify that the following individual was served with a copy of the **JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED ORDER]** on the date and via the method of service identified below:

**CM/ECF:**

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Attorneys for Plaintiff

Respectfully submitted this 11th day of December 2018,

/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney